

# Exhibit 7

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: INSULIN PRICING LITIGATION**

**Case 2:23-md-03080  
MDL No. 3080**

**JUDGE BRIAN R. MARTINOTTI  
JUDGE RUKHSANAH L. SINGH**

**THIS DOCUMENT RELATES TO: ALL ACTIONS**

**CASE MANAGEMENT ORDER # \_\_\_\_**

This Case Management Order, jointly proposed and agreed upon by the parties in accordance with Case Management Order #10 (Initial Discovery Plan) [ECF No. 198], sets forth the procedures and timeline for Discovery Requests, Plaintiff Fact Sheets, and other discovery at this stage in the above-captioned multidistrict litigation. Except as otherwise provided herein or in any other Case Management Order, discovery shall be governed by the applicable provisions of the Federal Rules of Civil Procedure. Unless specifically modified herein, nothing in this Order shall be construed to abrogate, modify, or enlarge the Federal Rules of Civil Procedure. The parties may agree to adjustments to the limits or deadlines set forth below and may, absent agreement, seek relief from the Court for good cause shown regarding the limits or deadlines.

**I. REQUESTS FOR PRODUCTION TO DEFENDANTS**

1. Plaintiffs<sup>1</sup> may collectively serve up to 45 total Requests for Production pursuant to Fed. R. Civ. P. 34 (“RFPs”) upon each Defendant. Plaintiffs need not serve the same set of RFPs on each Defendant.

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<sup>1</sup> As used herein, “Plaintiffs” refers collectively to the Plaintiffs in the member actions in MDL No. 3080.

2. Defendants shall serve written objections and responses within 45 days of being served.

3. For RFPs served on or before October 1, 2024, Defendants shall substantially complete production by May 22, 2025.

4. No RFPs shall be served later than 90 days before the close of fact discovery.

5. If Plaintiffs seek leave to serve additional RFPs, they shall request such leave at least 120 days before the close of fact discovery.

## **II. INTERROGATORIES TO DEFENDANTS**

1. Plaintiffs may collectively serve up to 25 total Interrogatories on each PBM Defendant and up to 15 total Interrogatories on each Manufacturer Defendant pursuant to Fed. R. Civ. P. 33 (“Interrogatories”). Plaintiffs need not serve the same set of Interrogatories on each Defendant.

2. Defendants shall serve written objections and responses to Plaintiffs’ Interrogatories within 60 days of service.

3. No Interrogatories shall be served later than 60 days prior to the close of fact discovery.

4. If Plaintiffs seek leave to serve additional interrogatories, they shall request such leave at least 90 days before the close of fact discovery.

## **III. SELF-FUNDED PAYER TRACK DISCOVERY**

**A. PFS Implementation Order.** Within 14 court days of an agreement by the parties or order of the Court establishing the form and substance of the Plaintiff Fact Sheet (“PFS”) for the Self-Funded Payer Track, the Parties will meet and confer and submit to the Court a proposed PFS Implementation Order. The PFS Implementation Order shall include, at a minimum, (a) a

definition of substantial completion; (b) a procedure for verification; (c) a procedure for amendments; (d) deadlines for submission; (e) a process for transmission to defendants; (f) a deficiency dispute resolution process; (g) guidelines for confidentiality; and (h) guidelines for the admissibility of PFS responses.

**B. Discovery Mechanism.** The parties agree that, at this time, no party shall serve any written discovery on Self-Funded Payer Plaintiffs other than the PFS or schedule any depositions of Self-Funded Payer Plaintiffs. However, the parties anticipate that cases will require further discovery pursuant to a future Court order, at which point further discovery and depositions will occur. Within 30 days of agreement by the parties or order of the Court establishing the form and substance of a PFS, the parties shall confer on the number of appropriate interrogatories, requests for production, and requests for admission in the cases.

#### **IV. STATE ATTORNEY GENERAL TRACK AND CLASS TRACK DISCOVERY**

##### **A. Requests for Production to State AG Track and Class Track Plaintiffs.**

1. Defendants may collectively serve up to 45 RFPs upon each Plaintiff in the State AG and Class Tracks of Plaintiffs. Defendants need not serve the same set of RFPs on each Plaintiff in the State AG Track and Class Track. Each Defendant and/or Defendant group may serve distinct RFP requests, but the limit of 45 RFPs applies collectively.
2. State AG Track and Class Track Plaintiffs shall serve written objections and responses to Defendants' RFPs within 45 days after being served.
3. For RFPs served on or before October 1, 2024, State AG Track and Class Track Plaintiffs shall substantially complete production by May 22, 2025.

4. No RFPs shall be served later than 90 days before the close of fact discovery.
5. If Defendants seek leave to serve additional RFPs, they shall request such leave at least 120 days before the close of fact discovery.

**B. Interrogatories to State AG Track and Class Track Plaintiffs.**

1. Defendants may serve up to 40 total Interrogatories on each Plaintiff in the State AG Track and Class Track. Defendants need not serve the same set of Interrogatories on each Plaintiff in the State AG Track and Class Track. Each Defendant and/or Defendant group may serve distinct interrogatories, but the limit of 40 interrogatories applies collectively.
2. State AG Track and Class Track Plaintiffs shall serve written objections and responses to Defendants' Interrogatories within 60 days of service.
3. No Interrogatories shall be served later than 60 days prior to the close of fact discovery.
4. If Defendants seek leave to serve additional interrogatories, they shall request such leave at least 90 days before the close of fact discovery.

**IT IS SO ORDERED.**

DATED:

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RUKHSANAH L. SINGH  
United State Magistrate Judge